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Magistrate Judge Mary Alice Theiler

MAR -9 2016

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

TONI ANDERSSON,

Defendant.

CASE NO.

*MI16-100*

COMPLAINT for VIOLATION

Title 18, U.S.C.

Sections 1343 and 2

BEFORE, Mary Alice Theiler, United States Magistrate Judge, U.S. Courthouse,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNTS 1-2**  
**(Wire Fraud)**

**A. Introduction**

1. At all relevant times, Expedited Solutions, LLC was an Illinois company, Trans SFO Inc. was a California company, and Exodus Freight Services Inc. was a Washington company.

2. R.L. is the President of TransGroup Worldwide Logistics ("TransGroup") and owner of Expedited Solutions, Trans SFO, and Exodus Freight, all of which contract with TransGroup and may conduct business in the name of TransGroup. Financial and

1 other records for all of the companies are maintained at a TransGroup office location in  
2 Seattle, Washington.

3 3. At all relevant times, Expedited Solutions, Trans SFO, and Exodus Freight  
4 Services operated as freight management companies. In the normal course of business,  
5 the three companies did not engage in financial transactions with each other.

6 4. From approximately August 2008 through February 22, 2016,  
7 TONI ANDERSSON was the Accounting Coordinator for TransGroup, and he was  
8 assigned to maintain the books and records of Expedited Solutions, Trans SFO, and  
9 Exodus Freight Services.

10 **B. Scheme and Artifice to Defraud**

11 5. Beginning in July 2010, and continuing through February 2016 at Seattle,  
12 within the Western District of Washington, and elsewhere, TONI ANDERSSON  
13 knowingly devised a scheme and artifice to defraud Expedited Solutions, Trans SFO, and  
14 Exodus Freight Services, and others, and to obtain money and property belonging to  
15 Expedited Solutions, Trans SFO, and Exodus Freight Services, by means of materially  
16 false and fraudulent pretenses, representations and promises, by causing more than 400  
17 checks to be written to himself, and creating corresponding false vendor entries in  
18 Expedited Solutions' accounting software to hide the fact that TONI ANDERSON had  
19 written the checks to himself.

20 **C. Manner and Means of the Scheme and Artifice to Defraud**

21 6. It was part of the scheme and artifice to defraud that TONI ANDERSSON  
22 created checks made out to himself drawn on Expedited Solutions' Key Bank account  
23 (xxxxxxx-5339).

24 7. It was further part of the scheme and artifice to defraud that  
25 TONI ANDERSSON used a signature stamp bearing the name of Expedited Solutions'  
26 owner, R.L., to sign the checks he had created payable to himself. R.L. never gave  
27  
28

1 TONI ANDERSON permission to use the stamp on, or to otherwise sign, checks made  
2 out to TONI ANDERSON.

3 8. It was further part of the scheme and artifice to defraud that  
4 TONI ANDERSSON created false and fraudulent entries in Expedited Solutions'  
5 accounting software showing false payments to vendors corresponding to the date and  
6 amount of the checks he had made payable to himself.

7 9. It was further part of the scheme and artifice to defraud that  
8 TONI ANDERSSON deposited the checks made payable to himself in his personal bank  
9 account at Wells Fargo (xxxxxx-9348).

10 10. It was further part of the scheme and artifice to defraud that  
11 TONI ANDERSSON transferred funds from bank accounts belonging to Trans SFO and  
12 Exodus Freight Services to the Expedited Solutions Key Bank account in order to  
13 maintain sufficient funds in the Expedited Solutions account to cover the checks he wrote  
14 to himself.

15 11. It was further part of the scheme and artifice to defraud that  
16 TONI ANDERSSON then created false and fraudulent entries in the respective  
17 companies' accounting books and records to hide the true nature of the fund transfers.

18 12. As a result of the scheme and artifice to defraud, TONI ANDERSSON  
19 fraudulently attempted to obtain and did obtain in excess of two million dollars  
20 (\$2,000,000) of funds belonging to Expedited Solutions, Trans SFO, and Exodus Freight  
21 Services.

22 **C. Execution of the Scheme and Artifice to Defraud**

23 13. On or about the dates set forth below, at Seattle, within the Western District  
24 of Washington and elsewhere, TONI ANDERSSON, having devised a scheme and  
25 artifice to defraud, and to obtain money and property by means of materially false and  
26 fraudulent pretenses, representations, and promises, transmitted and sent, and caused to  
27 be transmitted and sent, by means of wire communication in interstate commerce,  
28

writings, signs, signals, pictures, and sounds for the purpose of executing such scheme or artifice, including the following transmissions:

Count	Date of transmission	Victim	Sender	Recipient	Wiring
1	10/16/2015	Expedited Solutions	Wells Fargo Washington	Wells Fargo California	Digital image of Expedited Solutions \$10,000 check
2	12/31/2015	Expedited Solutions	Wells Fargo Washington	Wells Fargo California	Digital image of Expedited Solutions \$10,001.55 check

All in violation of Title 18, United States Code, Sections 1343 and 2.

I, Kathleen Moran, being first duly sworn on oath, depose and say:

#### **I. BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been a Special Agent for ten years and am currently assigned to the Seattle office of the FBI. My experience includes numerous investigations involving white collar crimes, including securities fraud, mail fraud, wire fraud, Ponzi schemes, and other investment frauds. The facts set forth in this Complaint are based on my own personal knowledge, training, and experience, interviews with victims and witnesses, review of documents I collected or was provided that are relevant to this investigation, and information that I gathered and observed first hand through the course of this investigation.

2. Because this Complaint is submitted for the limited purpose of establishing probable cause in support of an arrest warrant, it does not set for the each and every fact that I or others have learned during the course of this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that TONI ANDERSSON has committed the offense of Wire Fraud, in violation of Title 18, Sections 1343 and 2.

## II. FACTS

3. I believe that the investigation leading to the filing of this Complaint has established probable cause to believe that TONI ANDERSSON has engaged in wire fraud by fraudulently diverting company funds from Expedited Solutions' business bank account to his personal account. In connection with his fraudulent scheme, TONI ANDERSSON created false vendor entries in Expedited Solutions' accounting software, and false entries in the books and records of at least two other commonly owned companies, to hide the fact that he had written checks to himself.

### A. **Company and Bank Records**

4. As part of the investigation, I have reviewed records provided to me by TransGroup on March 4, 2016 and March 8, 2016, including the following:

- a. A check register report from January 5, 2010 to March 3, 2016 for checks written on the Key Bank account of Expedited Solutions;
- b. A spreadsheet listing checks made out to TONI ANDERSSON and the corresponding vendor name in Expedited Solutions' accounting software;
- c. Cancelled checks written to TONI ANDERSSON from the Expedited Solutions Key Bank account ending in 5339;
- d. Bank statements for Expedited Solutions' Key Bank account ending in 5339.

5. I have learned from TransGroup that TONI ANDERSSON had his paycheck directly deposited into a Wells Fargo account ending in 9348; however, I have not yet obtained bank records for accounts belonging to TONI ANDERSSON.

### B. **The Fraudulent Scheme**

6. Based on information provided to me by representatives of TransGroup, I know that TONI ANDERSSON, in his capacity as Accounting Coordinator at

1 TransGroup, was the sole person responsible for maintaining the books and records for  
2 Expedited Solutions, Trans SFO, and Exodus Freight Services. In that capacity,  
3 TONI ANDERSSON had full access to the financial records, bank accounts, and  
4 signature stamp for these three companies.

5 7. Based on my review of the check register report, beginning in July 2010,  
6 TONI ANDERSSON began creating checks made out to himself to be drawn on  
7 Expedited Solutions' Key Bank account ending in 5339. The check register report  
8 shows more than 400 checks written to TONI ANDERSSON for a cumulative amount of  
9 more than \$2,000,000.

10 8. Based on my review of the of the vendor list provided to me by  
11 TransGroup, TONI ANDERSSON created false entries in Expedited Solutions'  
12 accounting software showing payments to vendors corresponding to the date and amount  
13 of the checks he had made payable to himself.

14 9. R.L., president of TransGroup, told me that to sign the checks written to  
15 himself, TONI ANDERSSON used a signature stamp bearing the name of R.L., who was  
16 also the owner of Expedited Solutions. According to R.L., the stamp was only to be used  
17 in the event of an emergency, and TONI ANDERSSON did not have permission to use it  
18 on the checks made payable to himself. According to TransGroup's Executive Director  
19 of Operations, A.S., TONI ANDERSSON was not an authorized signor on the Expedited  
20 Solutions bank account.

21 10. The accounting records, check register, cancelled checks and bank  
22 statements provided to me by TransGroup showed the following:

23 11. On or about October 16, 2015, from the Expedited Solutions account,  
24 TONI ANDERSSON wrote check number 5462 in the amount of \$10,000 payable to  
25 himself. According to the information TONI ANDERSSON entered into the accounting  
26 software for Expedited Solutions, check number 5462 in the amount of \$10,000 is made  
27 out to a vendor called MEPT-Meadows. The check register, however, lists the actual  
28 name that is printed on the check, along with the vendor code. While the vendor code is

1 consistent with a code for MEPT-Meadows, the vendor name is TONI ANDERSSON. A  
2 review of the cancelled check shows that it is made out to TONI ANDERSSON at a prior  
3 residential address. The check is endorsed by an illegible signature, followed by the  
4 account number ending in 9348, which is the same account number into which TONI  
5 ANDERSSON's paychecks are deposited. The bank records provided showed that the  
6 check was debited from Expedited Solutions' Key Bank account on October 16, 2015.

7 12. On or about December 31, 2015, check number 5607 was written on the  
8 Expedited Solutions account in the amount of \$10,001.55 payable to  
9 TONI ANDERSSON. According to the information TONI ANDERSSON entered into  
10 the accounting software for Expedited Solutions, check number 5607 in the amount of  
11 \$10,001.55 is made out to MEPT-Meadows. According to the check register, the vendor  
12 name for check 5607 is TONI ANDERSSON. A review of the cancelled check shows  
13 that it is made out to TONI ANDERSSON and endorsed by an illegible signature,  
14 followed by the account number ending in 9348. The bank records provided showed that  
15 the check was debited from Expedited Solutions Key Bank account on December 31,  
16 2015.

17 13. According to a review of the three companies' accounts (Expedited  
18 Solutions, Trans SFO, and Exodus Freight Services) conducted by TransGroup,  
19 TONI ANDERSSON deposited checks payable to Trans SFO and Exodus Freight  
20 Services into the Expedited Solutions bank account, and transferred money from Trans  
21 SFO's and Exodus Freight Services' bank accounts to Expedited Solutions' bank  
22 account. These steps ensured adequate funds would be available in the Expedited  
23 Solutions' bank account to cover the checks TONI ANDERSSON wrote to himself.

24 14. For example, according to a review of the three companies' accounts  
25 conducted by TransGroup, in 2014 a total of approximately \$597,000 was withdrawn  
26 from Expedited Solutions through checks written to TONI ANDERSSON. In order to  
27 cover these payments, TONI ANDERSSON transferred approximately \$324,000 from  
28 Exodus Freight Services and \$176,000 from Trans SFO into the Key Bank account



1 belonging to Expedited Solutions. R.L told me that because the companies did not  
2 conduct financial transactions with each other, there would be no legitimate business  
3 reason for funds to be transferred between the accounts.

4 15. I have spoken to an investigator with Wells Fargo and learned that checks  
5 deposited at any Wells Fargo branch in the State of Washington are digitally imaged and  
6 sent electronically to a Wells Fargo server center in Fremont, California, where the  
7 checks are processed and posted to the appropriate accounts.

8 **C. February 23, 2016 Email from TONI ANDERSSON**

9 16. TransGroup was recently in the process of conducting an internal audit and  
10 noticed some discrepancies in the financial statements, relating to the above-described  
11 fraudulent scheme. On February 16, 2016, TransGroup's Director of Financial Services,  
12 L.D.G., requested a meeting with TONI ANDERSSON regarding the discrepancies. That  
13 same day TONI ANDERSSON stated that he could not make the meeting, and he never  
14 returned to work.

15 17. On February 23, 2016, R.L. and others received an e-mail from  
16 TONI ANDERSSON which read, in part:

17 The reason to my suicidal thoughts is I messed up big times...we opened  
18 our business and it did great first but then we ran into so many issues and I  
19 borrowed money from Expedited with intent to pay it back once business  
20 was back up again. It was such a bad and irrational move on my part and I  
so wish I could go back and not do it.

21 18. TONI ANDERSSON's February 23, 2016 email also stated "I talked to my  
22 brother and some other stuff has come up back home so I will have to try to make it there  
23 with all the stuff going on here too." I know from a review of records available to me  
24 that TONI ANDERSSON is a naturalized U.S. Citizen, who was born in Sweden.

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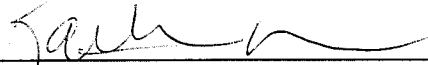
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III. CONCLUSION

19. Based on the above facts set forth in this Affidavit, I believe there is probable cause to believe TONI ANDERSSON did knowingly and intentionally commit the crime of wire fraud, in violation of 18 U.S.C § 1343 and 2.

  
KATHLEEN MORAN  
Special Agent, Federal Bureau of Investigation

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant TONI ANDERSSON committed the offense set forth in the Complaint.

Dated this 9 day of March, 2016.

  
MARY ALICE THEILER  
United States Magistrate Judge